

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
LIMETREE BAY SERVICES, LLC, <i>et al.</i> ,	§	Case No. 21-32351 (DRJ)
	§	
Debtors. <sup>1</sup>	§	(Joint Administration Requested)
	§	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned attorneys appear in the above-captioned cases on behalf of the ad hoc group of certain unaffiliated lenders, or investment managers or advisors to lenders, holding term loans issued under the Debtors' prepetition term loan facility (the "Ad Hoc Term Lender Group"), pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and respectfully request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and Bankruptcy Code sections 342 and 1109(b), that copies of all notices given or required to be given in the above-captioned cases and all papers served or required to be served in such cases be served upon the following:

**AKIN GUMP STRAUSS HAUER & FELD LLP**

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: Limetree Bay Services, LLC (1866); Limetree Bay Refining Holdings, LLC (1776); Limetree Bay Refining Holdings II, LLC (1815); Limetree Bay Refining, LLC (8671); Limetree Bay Refining Operating, LLC (9067); Limetree Bay Refining Marketing, LLC (9222). The Debtors' mailing address is Limetree Bay Services, LLC, 11100 Brittmoore Park Drive, Houston, TX 77041.

*-and-*

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**PLEASE TAKE FURTHER NOTICE** that, pursuant to Bankruptcy Code section 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, notices of any application, complaint, demand, hearing, motion, petition, order, pleadings or other request, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, electronic mail or otherwise, that is filed or given in connection with the above captioned cases.

**PLEASE TAKE FURTHER NOTICE** that the aforementioned attorneys request to be added to the official service list for notice of all contested matters, adversary proceedings and other proceedings in these cases.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to waive the Ad Hoc Term Lender Group's (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) right to enforce any contractual provisions with respect to arbitration; or (v) other rights, claims, actions, defenses, setoffs or recoupments to which the Ad Hoc Term Lender Group has or may be entitled to under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

*[Remainder of page intentionally blank]*

Dated: July 13, 2021

Respectfully Submitted,

**AKIN GUMP STRAUSS HAUER & FELD LLP**

/s/ Marty L. Brimmage, Jr.

Marty L. Brimmage, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that, on July 13, 2021, a true and correct copy of the foregoing document was served via email through the Bankruptcy Court's Electronic Case Filing System on the parties that have consented to such service.

/s/ Marty L. Brimmage, Jr.

Marty L. Brimmage, Jr.